UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re:

Ford Fusion and C-Max Fuel Economy Litigation,

This Document Relates to All Actions.

Case No. 13-MD-2450 (KMK)

MOTION FOR ADMISSION PRO HAC VICE OF RACHEL L. JENSEN

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, I Rachel L. Jensen, hereby move this Court for an Order for admission to practice Pro Hac Vice to appear as counsel for Plaintiff Nathan Montijo in the above-captioned action.

I am in good standing of the bar of the state of California and there are no pending disciplinary proceedings against me in any state or federal court.

DATED: August 2, 2013 Respectfully submitted,

ROBBINS GELLER RUDMAN & DOWD LLP RACHEL L. JENSEN

s/ Rachel L. Jensen
RACHEL L. JENSEN

655 West Broadway, Suite 1900 San Diego, CA 92101 Telephone: 619/231-1058 619/231-7423 (fax) rachelj@rgrdlaw.com

ROBBINS GELLER RUDMAN & DOWD LLP SAMUEL H. RUDMAN ROBERT ROTHMAN MARK S. REICH AVITAL MALINA 58 South Service Road, Suite 200 Melville, NY 11747 Telephone: 631/367-7100 631/367-1173 (fax)

ROBBINS GELLER RUDMAN & DOWD LLP PAUL J. GELLER JACK REISE STUART A. DAVIDSON MARK DEARMAN 120 East Palmetto Park Road, Suite 500 Boca Raton, FL 33432 Telephone: 561/750-3000 561/750-3364 (fax)

MCCUNE WRIGHT, LLP RICHARD D. MCCUNE ELAINE S. KUSEL 2068 Orange Tree Lane, Suite 216 Redlands, CA 92374 Telephone: 909/557-1250 909/557-1275 (fax)

Plaintiffs' Co-Lead Counsel, Master File No. SACV-12-02232-DOC(JPRx) (C.D. Cal.)

CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2013, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 2, 2013.

s/ Rachel L. Jensen

RACHEL L. JENSEN

ROBBINS GELLER RUDMAN & DOWD LLP 655 West Broadway, Suite 1900 San Diego, CA 92101-3301 Telephone: 619/231-1058 619/231-7423 (fax)

E-mail:RachelJ@rgrdlaw.com

Mailing Information for a Case 7:13-md-02450-KMK

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

• Panagiotis V Albanis

palbanis@forthepeople.com

• Megan Blair Benton

megan@kuhlmanlucas.com

• Timothy H. Birnbaum

timothy.birnbaum@dlapiper.com,DocketingNewYork@dlapiper.com

• Paula S. Bliss

pbliss@bubalolaw.com

• Craig L. Briskin

cbriskin@findjustice.com,Pleadings@findjustice.com,electroniccasefiling@labaton.com

• Michael A. Caddell

mac@caddellchapman.com,kek@caddellchapman.com

• James M. Campbell

jmcampbell@campbell-trial-lawyers.com

• Cynthia B. Chapman

cbc@caddellchapman.com

• Jeffrey M. Croasdell

jcroasdell@rodey.com

• Mark J. Dearman

 $mdearman@rgrdlaw.com, e_file_sd@rgrdlaw.com, e_file_fl@rgrdlaw.com$

· Joel A. Dewey

joel.dewey@dlapiper.com,trish.anderson@dlapiper.com,paula.palmere@dlapiper.com

• Cory Steven Fein

csf@caddellchapman.com,fdl@caddellchapman.com

• Mark S. Fistos

mark@pathtojustice.com

• Andrew Michael Fraerman

andrew.fraerman@dlapiper.com

· Scott A. George

sgeorge@seegerweiss.com

Scott Alan George

sgeorge@seegerweiss.com,lgriffith@seegerweiss.com,klaukaitis@seegerweiss.com

• Eric H Gibbs

ehg@girardgibbs.com

• Eric H. Gibbs

ehg@girardgibbs.com, dks@girardgibbs.com, jiv@girardgibbs.com, ds@girardgibbs.com, smg@girardgibbs.com, hhk@girardgibbs.com, alf@girardgibbs.com, ds@girardgibbs.com, smg@girardgibbs.com, hhk@girardgibbs.com, alf@girardgibbs.com, ds@girardgibbs.com, smg@girardgibbs.com, hhk@girardgibbs.com, alf@girardgibbs.com, alfwall.com, alfwall.c

• Matthew Aaron Goldberg

MATTHEW.GOLDBERG@DLAPIPER.COM

• Scott Grzenczyk

smg@girardgibbs.com

• Scott M Grzenczyk

smg@girardgibbs.com

• Spencer H. Gunnerson

s.gunnerson@kempjones.com

• Thomas M. Hnasko

thnasko@hinklelawfirm.com

• Dylan Hughes

dsh@girardgibbs.com,ale@girardgibbs.com

- Steven R. Jaffe steve@pathtojustice.com
- Rachel L. Jensen rachelj@rgrdlaw.com
- J. Randall Jones jrj@kempjones.com
- Heidi H Kalscheur hhk@girardgibbs.com
- Amy Elisabeth Keller aek@wexlerwallace.com
- Jae Kook Kim jkk@mccunewright.com
- Bradley K. Kuhlman brad@kuhlmanlucas.com
- Elaine S Kusel esk@mccunewright.com
- Seth Michael Lehrman seth@pathtojustice.com
- Rodney E. Loomer rloomer@trdlp.com
- Chad Cameron Lucas chad@kuhlmanlucas.com
- Richard D McCune, Jr rdm@mccunewright.com,ams@mccunewright.com,jkk@mccunewright.com
- Robert A Mosier rmosier@thesandersfirm.com,brandy@justiceforyou.com,rkassan@thesandersfirm.com
- Geoffrey A Munroe gam@girardgibbs.com,jiv@girardgibbs.com
- Edward K. O'Brien eobrien@ekoblaw.com
- J Trumon Phillips trumon.phillips@dlapiper.com
- Christopher Stephen Polaszek cpolaszek@forthepeople.com
- Maya Prakash maya.prakash@dlapiper.com
- Sherry A. Rozell srozell@trdlp.com
- Peter George Safirstein psafirstein@forthepeople.com
- Jonathan Shub jshub@seegerweiss.com,lgriffith@seegerweiss.com,klaukaitis@seegerweiss.com
- Rachel L. Soffin rsoffin@forthepeople.com,lannis@forthepeople.com
- Rachel Lynn Soffin rsoffin@forthepeople.com
- David Stein ds@girardgibbs.com
- David K Stein ds@girardgibbs.com
- Edward Colin Thompson colin.thompson@dlapiper.com
- Edward Anthony Wallace

Case 7:13-md-02450-KMK Document 39 Filed 08/02/13 Page 7 of 7

eaw@wexlerwallace.com

John A. Yanchunis jyanchunis@forthepeople.com,tponder@forthepeople.com,lannis@forthepeople.com

- John Allen Yanchunis, Sr jyanchunis@forthepeople.com
- Jeffrey M Yeatman jeffrey.yeatman@dlapiper.com
- Christopher M Young christopher.young@dlapiper.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

Jeremy Dobbs

′

Cory Steven Fein Caddell & Chapman 1331 Lamar St. Suite 1070 Houston, TX 77010

Lawrence Moss

,